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official capacity as Director of the California
8 *Department of Managed Health Care and the*
California Department of Managed Health Care
9

10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE NORTHERN DISTRICT OF CALIFORNIA
12 OAKLAND DIVISION
13

14 **GRACE SMITH and RUSSELL**
15 **RAWLINGS, on behalf of themselves and**
16 **CALIFORNIA FOUNDATION FOR**
17 **INDEPENDENT LIVING CENTERS, a**
California nonprofit corporation,

18 Plaintiffs,

19 v.

20 **MARY WATANABE, in her capacity as**
21 **Director of the California Department of**
22 **Managed Health Care; CALIFORNIA**
23 **DEPARTMENT OF MANAGED HEALTH**
CARE; and KAISER FOUNDATION
HEALTH PLAN, INC.,

24 Defendants.
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4:21-cv-07872-HSG

DECLARATION OF SARAH REAM IN
SUPPORT OF DEFENDANTS DMHC
AND DIRECTOR WATANABE'S
MOTION TO DISMISS FIRST
AMENDED COMPLAINT

Date: April 28, 2022

Time: 2:00 pm

Dept: Courtroom 2, 4th Floor

Judge: The Honorable Haywood S. Gilliam, Jr.

1 I, SARAH REAM, declare as follows:

2 1. I am Chief Counsel of the California Department of Managed Health Care (DMHC).
3 My responsibilities include advising the DMHC's executives regarding the law applicable to the
4 DMHC and its operations, as well as the law applicable to the health plans the DMHC regulates. I
5 also oversee the work of the DMHC's Office of Legal Services, which serves as in-house counsel
6 to the DMHC. I have held my current position since December 2019. Through my
7 responsibilities, I have become familiar with the financing of the DMHC's operations. I provide
8 this declaration in support of defendants DMHC and DMHC Director Watanabe's Motion to
9 Dismiss Plaintiffs' First Amended Complaint.

10 2. I have personal knowledge of the matters stated herein, and could, if called upon,
11 testify competently as to these matters.

12 3. DMHC does not receive any federal financial assistance, including any credits,
13 subsidies, or contracts of insurance.

14 I declare under penalty of perjury that the foregoing is true and correct. Executed on this
15 4th day of February, 2022, in Sacramento, California.

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18 Sarah Ream
SARAH REAM

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